

EXHIBIT B-2

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14 *Attorneys for Defendants*
15 *ALPHABET INC., and GOOGLE LLC, and LOON*
LLC

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN JOSE DIVISION

19
20 SPACE DATA CORPORATION,

21 Plaintiff,

22 v.

23 ALPHABET INC., GOOGLE LLC, and
LOON LLC

24 Defendants.
25
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27
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Case No. 5:16-cv-03260-BLF (NC)

**DEFENDANTS' PROPOSED JUROR
QUESTIONNAIRE**

Pre-Trial Conf.: July 19, 2019

Time: 9:00 a.m.

Judge: Hon. Beth Labson Freeman

Trial Date: August 5, 2019

Courtroom: 3, Fifth Floor

Juror Questionnaire

Northern District of California, San Jose Division

Thank you for coming to court as a potential juror. In order to select a jury, the judge and the people involved in the case need to know something about you to select jurors who can be fair to both sides.

You are hereby **ordered** not to discuss this case with anyone; do not allow anyone to discuss the case with you. The only information you may tell anyone is that you are in a jury pool for a trial and the time requirements of that trial. You are also ordered not to read, listen to, or watch any news, Internet, or other media accounts of this case, past or present. You may not do research about any issues involved in the case. You may not blog, Tweet, or use the Internet to obtain or share information.

Everyone has attitudes and opinions that are shaped by their life experiences. Sometimes these experiences can make it difficult to look at a certain issue in an unbiased and unemotional way. As a juror, you must return a verdict based on the law and on the facts proved in court, not on emotion or on other views not supported by the evidence. The judge will give you instructions on the law and on how you should go about deciding the case. You must listen to and follow the judge's instructions.

The questions on this form are designed to help the court and the lawyers learn something about your background and your views on issues that may be related to this case. The questions are asked not to invade your privacy, but to make sure that you can be a fair and impartial juror. If there is any reason why you might not be able to give both sides a fair trial in this case, it is important that you say so.

***PLEASE PRINT ALL ANSWERS. IF THERE IS NOT ENOUGH ROOM TO ANSWER COMPLETELY,
CONTINUE ON A BLANK PIECE OF PAPER.***

14. Do you have any strong positive or negative opinions about Google LLC as a company or its senior executives, products or services?

☐ Yes ☐ No

If yes, please explain:

15. Have you, any member of your family, or anyone close to you ever had a business relationship with Space Data Corporation or Google LLC?

☐ Yes ☐ No

If yes, please explain:

16. Do you or a family member or close friend have any training or experience in any of the following (Check all that apply):

- | | |
|----------------------------------------------------------------|---------------------------------------------------------------------|
| <input type="checkbox"/> Law or the Courts | <input type="checkbox"/> Accounting or Finance |
| <input type="checkbox"/> Contracts | <input type="checkbox"/> Financial or Business Analysis or Modeling |
| <input type="checkbox"/> Trade Secrets | <input type="checkbox"/> Acquisitions or Mergers |
| <input type="checkbox"/> Patents | <input type="checkbox"/> Dispute Resolution or Mediation |
| <input type="checkbox"/> Licensing | <input type="checkbox"/> Engineering |
| <input type="checkbox"/> High-Altitude Balloon Technology | <input type="checkbox"/> Aeronautical or Astronautical Engineering |
| <input type="checkbox"/> Internet Operations | <input type="checkbox"/> Stratospheric Winds |
| <input type="checkbox"/> Satellite or Wireless Technologies | <input type="checkbox"/> Meteorology or Weather |
| <input type="checkbox"/> Networking Technologies and Equipment | <input type="checkbox"/> Thermal Management |
| <input type="checkbox"/> Computer Products | <input type="checkbox"/> Altitude Control and Monitoring Systems |
| <input type="checkbox"/> Information Technology | <input type="checkbox"/> Non-Disclosure Agreements |
| <input type="checkbox"/> Rural/Remote Data Communications | |

If yes to any, please explain:

17. Have you or someone close to you ever (Answer each one):

- | | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|
| a. Been involved in a lawsuit as a party or witness? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| b. Been involved specifically in an intellectual property suit, e.g. patents, trade secrets, trademarks, or copyrights? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| c. Been involved with due diligence of a company for investment or acquisition? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| d. Been involved in a dispute over a contract? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| e. Been a victim of fraud? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| f. Been in a situation where somebody else stole an original work of authorship, or a product, process, or idea that you (or someone close to you) had developed? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| g. Been accused of stealing an original work of authorship, or a product, process, or idea? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| h. Been involved in a dispute involving a Non-Disclosure Agreement? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| i. Been involved in a dispute over alleged misappropriation of trade secrets? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| j. Worked for a company that was involved in a dispute about its trade secrets or confidential information? | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| k. Owned stock in Alphabet Inc.? | <input type="checkbox"/> Yes <input type="checkbox"/> No |

If yes to any, please explain:

| | |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>18. Have you previously served as a trial juror or as a grand juror? <input type="checkbox"/> Yes (When? _____) <input type="checkbox"/> No</p> <p><u>If yes:</u></p> <p>Was that service: <input type="checkbox"/> Civil, _____ times <input type="checkbox"/> Criminal, _____ times</p> <p>Did all of the juries reach a verdict? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Were you ever the foreperson? <input type="checkbox"/> Yes, _____ times <input type="checkbox"/> No</p> <p>How would you describe your jury service? <input type="checkbox"/> Positive <input type="checkbox"/> Negative <input type="checkbox"/> Mixed/Both positive and negative</p> <p><u>Please explain and identify the nature of the case (e.g., robbery, personal injury, etc.):</u></p> | <p>19. Do you have any physical problems (vision, hearing, or other medical problems) that might affect your ability to serve as a juror? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please explain:</p> |
| <p>20. Describe any ethical, religious, political, or other beliefs that may affect your jury service or prevent you from serving as a juror (and whether you hold any offices or leadership roles in affiliated groups/organizations):</p> | <p>21. Do you know anyone on this jury panel? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, who?</p> |

22. Have you ever heard of "Loon" or "Project Loon"?

☐ Yes ☐ No If yes, please explain:

Have you ever heard of "Space Data Corporation" or "Space Data"?

☐ Yes ☐ No If yes, please explain:

23. The attorneys may need to ask you follow up questions. Are there any questions that you would prefer to discuss in private?

☐ Yes ☐ No If yes, please explain:

24. Describe anything not covered by this questionnaire that might affect your ability to be a fair and impartial juror:

Below is a list of people and entities that are in some way connected to this case, whether as parties, possible witnesses or lawyers working on the case. If you know or have any close association with any of these individuals and/or entities (such as a business relationship or social connection), please indicate this by placing a checkmark next to that individual or entity's name.

| Parties to the Lawsuit | Possible Witnesses | |
|----------------------------------------------------------------------------------------------|--------------------|-----------------------------------|
| Space Data Corporation | Larry Alder | John Hansman |
| Alphabet Inc. | Bruce Barkley | Dan Ingberman |
| Google LLC | Gary Barta | Minnie Ingersoll |
| Loon LLC | Cliff Biffle | Gerald Knobloch |
| Lawyers Associated with the Lawsuit | Anne Bray | James Knobloch |
| Hosie Rice LLP (Representing plaintiff Space Data Corporation) | Sergey Brin | Daniel McCloskey |
| Spencer Hosie | Kyle Brookes | William McCulloughChristine Meyer |
| Diane Rice | Sal Candido | Larry Page |
| Brandon Martin | John Carlin | Mike Pearson |
| Darrell Atkinson | Daniel Conrad | Dan Piponi |
| Francesca Germinario | David Coombs | George Ritchie |
| | Chad DeMeese | Chris Sacca |
| | Richard DeVaul | Astro Teller |
| | Paul Frey | Jerry Quenneville |
| Keker Van Nest & Peters LLP (Representing defendants Alphabet Inc., Google LLC and Loon LLC) | Eric Frische | Josh Weaver |
| Robert Van Nest | Andy Germer | Alastair Westgarth |
| Christa Anderson | Arthur Giannetti | Jim Wiesenber |
| Matthew Werdegarr | Mauro Goncalves | David Wu |
| Eugene Paige | | |
| Matthias Kamber | | |
| Ryan Wong | | |
| Thomas Gorman | | |
| Leah Pransky | | |
| Shayne Henry | | |
| Andrew Bruns | | |
| Bevan Dowd | | |
| Victor H. Yu | | |
| In-house lawyers for defendants Alphabet Inc., Google LLC or Loon LLC | | |
| Chester Day | | |
| Rosa Yaghmour | | |

If you checked any of the above names, please explain your relationship to each name you have checked:

I swear that all the foregoing is true and correct.

SIGNATURE AND DATE:

Dated: July 8, 2019

Respectfully submitted,

/s/ Robert A. Van Nest

Robert A. Van Nest

Attorneys for Defendants

ALPHABET INC., GOOGLE LLC, and LOON LLC